

PROCUREMENT MANAGEMENT REVIEW (PMR) REFERENCE GUIDE



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FOREWORD

1. This reference guide establishes standards and outlines procedures for the review of all U.S. Army Nonappropriated Fund (NAF) procurement operations. The electronic version is available on the Internet at www.armymwr.com. Updates will be issued electronically.
2. Recommended changes should be sent to Ms. Mary Keeney, Chief of the NAF Contracting Directorate's Policy and Operations Division. You may contact her at (703) 681-5302; Fax (703) 681-5363; Email: Mary.Keeney@cfsc.army.mil.

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**PROCUREMENT MANAGEMENT
REVIEW (PMR) REFERENCE GUIDE**

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PART I. PREPARING FOR A NAF PROCUREMENT MANAGEMENT REVIEW (PMR)

CHAPTER 1. THE ARMY NAF CONTRACTING PMR

Introduction

The purposes of the Procurement Management Review (PMR) are to—

- (1) assist Contracting Chiefs and Commanders with improving the operational efficiency and effectiveness of their organizations;
- (2) periodically provide USACFSC's Commander and IMA Regional Directors with an evaluation of the integrity of the nonappropriated funded (NAF) procurement process, the achievement of Army goals, assessment of the quality of career development within the contracting workforce, and assessment of compliance with statutory requirements by each contracting office; and
- (3) provide contracting offices with on-site assistance and training.

The PMR is designed to provide local reviews of the Army's NAF contracting elements by a team of contracting professionals from the USACFSC staff or field/consolidated/regional procurement organizations.

PMR Authority

Army Regulation (AR) 215-4, paragraph 1-9, designates the Commanding General, USACFSC, and IMA Regional Directors with the responsibility for management and oversight of NAF contracting activities under their command. The responsibility includes PMRs. The Armed Forces Recreation Centers (AFRCs) and the Army Recreation Machine Program (ARMP) are under the command of USACFSC. Upon request, personnel from the USACFSC NAF Contracting Directorate will assist the IMA Regional Directors in providing management assistance.

AR 215-4, paragraph 1-7, designates the Commander, United States Military Entrance Processing Command (USMEPCOM), with the responsibility for the management and oversight of NAF contracting activities within USMEPCOM. This responsibility includes PMRs. Upon request, personnel from the USACFSC NAF Contracting Directorate will assist the USMEPCOM in providing management assistance.

Review Concept and Objectives

In January 2000, the Army's NAF contracting community implemented the Procurement Management Assistance Program (PMAP) to assist Commanders, IMA Regional Directors and

Contracting Chiefs improve the overall efficiency and effectiveness of our procurement organizations in five areas (see PMAP, *Exhibit A*)—

- Leadership
- Strategic planning
- Technical compliance and management of key procurement processes
- Customer focus
- Human resource management

The PMAP requires NAF procurement organizations to perform continuous self-assessment through procurement performance-based measurements, including the results of employee and customer surveys. The procurement organization is expected to use self-assessment results to continuously evaluate its technical compliance, the quality of its procurement processes and management systems, its ability to know when corrective action is appropriate and to make the necessary improvements.

One element of the PMAP is the PMR. Such reviews are the Commander and the IMA Regional Director's primary vehicle for accomplishing and documenting oversight and to ensure adherence to the PMAP criteria as listed above. The PMR team members will evaluate the procurement organization's adherence to applicable regulations and instructions (e.g., AR 215-1, AR 215-3, AR 215-4 DODI 4105.71, and DODD 4105.67), statutes, laws, and best acquisition and business practices. The PMR team will give special attention to PMAP self-assessment results.

PMR Frequency

All Army NAF contracting elements will receive PMRs, performed either by USACFSC personnel or field/consolidated/regional procurement organizations. It is recommended that each contracting office receive at least one review every 12-18 months. The number and type of observations and findings, especially repeat findings, will play a role in how often a contracting office is reviewed.

Review Standards

Due to different PMR team composition, different team leaders, different levels of review, and the broad variety of contracting offices to be reviewed, it is desirable to promote uniformity in review coverage, conduct, methods of report writing, and close out. The following areas apply to all PMRs of the Army's NAF contracting operations and elements:

- Scope of review;
- Approaches for preparing and conducting a PMR;
- Standards for writing reports;
- Format for publishing reports;
- Guidance on selecting, training, and supervising team members;
- Process for preparing, coordinating, and distributing reports; and

- Closing out the reports.

CHAPTER 2. PREPARING FOR A PMR

Introduction

Comprehensive preparation is an indispensable component of a successful PMR. If done properly, PMR planning will reduce the funds, personnel, and time needed on-site to execute the review. The objective of preparation is for the PMR team members to arrive on-site with basic knowledge of the procurement organization's mission, organizational structure, workload, and operational practices. At a minimum, the following items should be included in the planning and preparation for the upcoming PMR: establishing the review level, notifying the procurement organization to be reviewed, obtaining advance data (when necessary), selecting members of the team, and assigning team members' responsibilities. Fortunately, the types of data most likely to be requested by the PMR team are readily available in the NAF contracting community's automated procurement system, SNACS/PRISM.

Notifying the Procurement Organization to be Reviewed

The PMR Team Leader will consult with the Contracting Chief of the office being reviewed to determine the best time for the review to be conducted. This coordination generally is done by telephone or Email approximately 90 to 120 days before the on-site review is underway. Additionally, the Team Leader will mail a written notification to the Commander or General Manager of each procurement organization scheduled for a PMR. Such notification should arrive at the procurement organization approximately 45 days prior to the beginning of the review. (See Letter of Notification to Commander or General Manager, *Exhibit C.*)

Selecting Members of the PMR Team

The PMR Team Leader will determine the composition and size of the PMR team, and the duration of individual team member assignments to the team. There may be times when it is necessary to include a member from the legal office on the PMR team. The PMR Team Leader will assign each team member material to be reviewed during the PMR. The team member will prepare documentation and findings, if any.

Team Leader Responsibilities

The PMR Team Leader is responsible for overall team management, including planning, conducting the review, and preparing, or overseeing preparation of, the PMR Report. For reviews conducted by USACFSC personnel, the NAF Contracting Directorate's Chief of Policy and Operations or a senior member of the chief's staff will serve as the PMR Team Leader. Specific Team Leader responsibilities include:

- Selecting and notifying team members;

- Designating team member work assignments (areas to be reviewed);
- Identifying, collecting, analyzing, and disseminating to team members the data relative to the procurement organization being reviewed;
- Making arrangements with the procurement organization to be reviewed;
- Scheduling unique on-site requirements, such as interviews with leadership and the servicing legal representative, discussions with groups of customers, etc.;
- Managing/supervising the on-site process;
- Participating as a working member of the team in selected areas;
- Providing daily status briefings to the Contracting Chief, as needed;
- Providing an exit briefing to the Commander, or designated representative, and the Contracting Chief;
- Reviewing/approving written findings of team members and preparing, or overseeing preparation of, the PMR Report;
- Maintaining the master file of working papers;
- Coordinating the draft report with appropriate staffing officers and obtaining approval of the final report signed by the Commander, USACFSC, or IMA Regional Director;
- Distributing the PMR Report to the procurement organization reviewed;
- Responding to questions and concerns raised by the procurement organization reviewed as a result of the PMR Report;
- Reviewing corrective action(s) proposed and taken by the procurement organization reviewed; and
- Performing follow-up duties, as necessary, to close out the report.

Team Member Responsibilities

The PMR process is a team effort that must be managed by the PMR Team Leader. Accordingly, team members will receive all work assignments and direction from the leader. The Team Leader must approve, prior to pursuit, any activity during the PMR process not directed by the Team Leader.

Team members are assigned to the PMR team for the duration of the review unless an earlier release has been agreed to or directed by the PMR Team Leader. The team members are responsible for coordinating their own travel arrangements such as hotel accommodations, rental cars, airline reservations, etc.

A team member's analysis begins before arriving to the on-site location of the review. The member should review advance information and study previous PMR Reports to identify follow-up requirements, especially pertaining to repeat findings.

Team members are expected to take extensive and thorough notes on material reviewed and during the personnel interviews. This includes documentation of contract files reviewed, on-site observations, findings, and preliminary recommendations. Should the Team Leader determine the documentation provided by the team member is insufficient, the paperwork will be returned for completion. Moreover, team members are responsible for providing input for the exit brief. All findings will be recorded in the electronic format prescribed in *Exhibit D* (PMR Evaluation

Matrix), and the Team Leader, or designee, is responsible for development and content of the PMR Report.

Work Schedule

The length of time required to perform a PMR will depend upon the size of the organization, the size of the review team, and the scope and depth of reviews. The Team Leader, based upon these three factors and experience, determines the actual time allotted to each review element.

Briefings and Discussions

Chief of the procurement organization being reviewed will conduct an entrance brief for the PMR team. The purpose of this briefing is to report PMAP self-assessment results; present challenges and efforts to make improvements; and introduce PMR team members to the contracting staff and the supervisor(s).

Discussions regarding observations and findings must be limited to those individuals in the organization who have a need to know, such as employees with a working knowledge of the area reviewed and their supervisor(s). The PMR Team Leader will keep the Contracting Chief informed of all potential findings periodically throughout the review. **Any discussions with personnel outside the organization being reviewed regarding findings, or the proposed content of the PMR Report, are strictly forbidden.** Because of the sensitive nature of PMRs, discussions or sharing of findings beyond the individuals listed above should be cleared in advance with the PMR Team Leader. If USACFSC personnel are performing the review, this permission will come from the Director, NAF Contracting Directorate.

The PMR Team Leader will provide the Commander or General Manager, or designated representative, an exit briefing at the conclusion of the review. A copy of preliminary findings will be provided to the Contracting Chief at that time. For those reviews conducted by USACFSC personnel, the Team Leader will give the Director, NAF Contracting Directorate, an in-depth briefing on each significant finding.

PART II. CONDUCTING A PMR

CHAPTER 1. CONDUCTING THE REVIEW

Introduction

This chapter provides a structured approach to guide PMR team members during reviews. It is imperative that the members stay focused and meet the purposes of a PMR as outlined in Part I, Chapter 1, Introduction, of this reference guide.

Review Methods

The purpose of the review is to provide on-site assistance and training and to assess the efficiency and effectiveness of the procurement organization's acquisition function. This will be accomplished by reviewing local processes and procedures; studying organizational charts, strategic business plans, management control checklists; analyzing purchase card information and SNACS/PRISM-generated data; and conducting interviews with appropriate personnel, e.g., contracting staff members, customers, legal, finance and accounting.

Material that will generally be available for review include local standing operating procedures, internal forms, contracts, purchase/delivery/task orders consignment agreements, blanket purchase agreements (BPAs), basic ordering agreements (BOAs), files, legal reviews, exceptions to policy under which the organization is operating, employee individual development plans, position guides, performance standards, customer survey results, and management information system data, such as workload data. Exercising good judgment in selecting material to be reviewed, the amount of material to be reviewed, and the adequacy of the procurement organization's documentation will largely determine the effectiveness of the team.

Interviews with contracting and other personnel should be used to expand upon findings, determine rationale for actions, or pursue leads noted during the review of selected written material. Interviews provide an excellent forum for team members to better understand the procurement organization's management philosophy and its overall approach to acquisition and day-to-day operations at the contracting officer's level. Interviews also allow PMR team members to discuss deficiencies and present ideas for enhancing local operations. Finally, interviews allow team members to discuss issues deemed "significant findings" to ensure that all facts and rationale for actions are considered before a finding is reported.

While adequate samples of contracting procedures, procurement actions and personal interviews should enable each team member to identify significant trends and operational strengths and/or weaknesses within the procurement organization's buying operations, more targeted file reviews and interviews may be required to determine the significance of the finding. The PMR Technical Evaluation Checklist, *Exhibit B*, should be used to assist PMR team members with reviewing files and determining whether the procurement organization being reviewed is technically compliant and managing key procurement processes. The checklist contains events and procedures in a logical sequence covering the entire acquisition process from acquisition

planning and purchase request initiation to contract administration and closeout. The checklist promotes consistent analysis and provides systematic means of organizing the file review process. Results of each file review will be recorded in the electronic format prescribed in *Exhibit D, PMR Evaluation Matrix*.

Distinguishing Between Observation and Finding

It is essential that all PMR team members understand the difference between “Observation” and “Finding.” After participating on several PMRs, most members become proficient at making this distinction.

Many process improvements, inefficient operations, and one-time technical noncompliances will be noted during the review that do not warrant being written up as a finding, yet should be corrected. The PMR team members will treat these occurrences as “Observations.” Generally, they should be documented in the team member’s working file, and not in the PMR Report.

Occasionally, the Team Leader may determine that it is necessary to address in the PMR Report those observations that exhibit the potential of becoming findings. The PMR team member noting such observation, or the Team Leader, should provide on-site assistance and training to the contracting professional responsible for the action.

Findings, on the other hand, are significant or material deficiencies in terms of impact and sometimes occurrence. Particular attention should be paid to “Repeat Findings.”

When a trend is noted and the deficiency is sufficient to warrant writing a finding, it should be written and given to the Team Leader along with a copy of the worksheets (i.e., backup materials). As reviewers become experienced conducting PMRs, the standardized approach will become second nature to them and they will know when they have seen a sufficient number of occurrences to warrant a written finding. Until this level of confidence is gained, advice should be sought from the Team Leader.

The Team Leader or PMR team member will label a one-time, or isolated occurrence, as a finding when necessary. This occurs when the event or observation is so significant that it could have an adverse impact on the overall operation of the procurement organization. Examples include exceeding certified funding levels; exceeding the contracting officer’s warrant authority; and failure to follow ratification procedures for an unauthorized commitment.

Examining Files

PMR team members are likely to examine a variety of files during a review. For example, in addition to contract and purchase order files, members will review BPA files, lease agreements, standing operating procedures, Contracting Officer appointment files, internal management control files, as well as an assortment of other administrative files. In all cases, team members must determine whether the processes, procedures, and decisions documented in the files indicate that the procurement organization is following sound procurement and business

practices and complying with AR 215-1, AR 215-3, AR 215-4, DoD guidance, and local procedures.

Normally, files, and particularly contract actions, to be reviewed should be limited to those awarded since the last review. Exceptions to this practice will be long-term contracts.

Reviewers should have a systematic approach for examining files. A summary of each file reviewed should be logged in the electronic format prescribed in *Exhibit D* (PMR Evaluation Matrix). This practice will aid the reviewer in determining when sufficient occurrences have been noted to indicate a trend. Every item recorded must be labeled as “Observation” or “Finding,” and all “Repeat Findings” should be clearly identified.

All files and contracts reviewed by PMR team members shall be returned promptly to the appropriate place, and they shall be in the same condition they were when provided to the team for review.

Conducting Interviews

Interviews with key personnel should be part of the on-site review. A combination of reviewing documents and conducting face-to-face discussions will be used to develop the overall appraisal of the quality, effectiveness, and efficiency of procurement operations at the procurement organization. The Team Leader may choose to accompany team members when they conduct face-to-face discussions with senior managers within the procurement organization. Sample interview questionnaires are provided as *Exhibit E*.

Interviews can be substantially improved by keeping the following principles in mind:

- a. Be clear, concise, courteous, constructive, and professional throughout the interview.
- b. Begin the session by setting the stage and encouraging the individual being interviewed to relax. As a minimum, the following topics should be discussed at the beginning of the session.
 - (1) Clearly explain the purpose of the PMR, i.e., improve efficiency and effectiveness, and enhance employee development through quality training and job experience.
 - (2) Tell the individual being interviewed that the source of the information provided will be kept confidential. (Explain that the notes taken by the interviewer are to keep facts straight, not identify the source.)
 - (3) Ask the individual being interviewed to provide any information that would help the PMR effort.
- c. Avoid asking leading questions and those that can be answered with a simple “yes” or “no.”

- d. Keep the interview on track, moving toward accomplishing the defined objective.
- e. Yet, allow flexibility to enable the individual being interviewed to provide additional leads and/or identify other deficiencies.
- f. End the interview with a restatement of facts presented and any conclusions that you have drawn from them. Express your gratitude as appropriate.

Time Management

The most prevalent shortcoming of inexperienced PMR team members is their inability to determine when to terminate the review, write it up and move on to the next review item. As a result, they spend far too much time on the first items that they review and too little time on the remaining areas. Less experienced reviewers should seek the advice of the Team Leader or other experienced team members on their first few findings to determine when to prepare write-ups and move on to the next area. After participating on several PMRs, most members become adept at determining when to conclude their review of one area and move on to the next.

Providing Assistance and Training

As mentioned earlier, one of the primary objectives of the PMR is to assist Contracting Chiefs and Commanders and General Managers with improving the operational efficiency and effectiveness of their organization. The most efficient means for accomplishing this objective is through on-site assistance and training during the review. Observations and findings noted during the review may be discussed with the Contracting Chief, contracting officer or contract specialist during the on-site review.

Preparing Findings

Reviewers should prepare findings as soon as a significant deficiency or undesirable trend is noted and confirmed through an interview with the personnel or file review.

Each finding will consist of three parts: a succinct statement of the finding (i.e., problem or deficiency); the extent of the problem and all the pertinent details and circumstances regarding the observation; and a recommendation. The finding should be tied to a regulation, statute or policy whenever applicable. Repeat findings from the last PMR should be clearly noted. The recommendation should tell the Contracting Chief what actions should be taken to correct the deficiency. Reviewers should proof their write-ups and ensure that their notes sufficiently back up the findings.

PART III. PREPARING AND ISSUING THE PMR REPORT

CHAPTER 1. PREPARING THE REPORT

Introduction

A report will be published within 45 calendar days after completion of the on-site review.

The report will convey findings and recommendations to the Contracting Chief and the Commander or General Manager, which in the cumulative, provide an overall assessment of the procurement organization's standing with regard to the five PMAP areas: leadership, strategic planning, technical compliance and management of key procurement processes, customer focus, and human resource management. Because of the on-site staff assistance and training, the PMR Report will not address small or inconsequential problems, but only the more significant findings.

Responsibilities

The PMR Team Leader is responsible for preparing the report or overseeing its preparation. Each team member is responsible for documenting and reporting results of the area(s) reviewed. The member should pay particular attention to thoroughly documenting results. For example, all observations and findings should reference contract/order number, delivery/period of performance, amount, purchase description, and regulation paragraph numbers. Recommendations should be addressed in the documentation.

As mentioned earlier, many observations noted during a review will be corrected through PMR team assistance on-site during the review. Therefore, the Team Leader shall ensure that reports do not address isolated or relatively inconsequential problems. PMR Reports will cover significant findings, and will require Contracting Chiefs to respond to each finding with a proposed plan designed to correct administrative and operational problems and improve business practices. The primary emphasis will be on enhancing mission performance Army-wide, as well as at individual activities, through encouragement of, and assistance in, rectifying noted deficiencies. Further, the Team Leader will make certain that the positive practices adopted by the office being reviewed are mentioned in the report as well as the findings.

Format for Responses

Exhibit F, Sample PMR Report Format, serves as an outline for writing the report, and provides a basis for maintaining uniformity and consistency among reviews of various activities.

Recognizing that each procurement organization varies as to mission, organization, and methods of contracting, the format should not be construed as mandating an inflexible style in which the reports will be written.

CHAPTER 2. ISSUING THE REPORT

Introduction

The PMR Team Leader is responsible for ensuring that the PMR Report is released within 45 calendar days after completion of the on-site review. Issuing the report in a timely fashion enables the procurement organization to initiate needed corrective action right away. Further, the specific details associated with the findings are still fresh which facilitates resolution of any disagreements between the PMR team and the reviewed procurement organization that were not resolved while the PMR team was on-site.

Coordination and Approvals

The Team Leader should provide team members with an opportunity to review and comment on the draft PMR Report. Each PMR Report should undergo formal coordination in accordance with local staffing practice. For reports issued by USACFSC, as a minimum, coordination will be obtained from legal and USACFSC NAF Contracting Directorate's Director and Chief of Policy and Operations.

Management Milestones

The PMR Team Leader is responsible for milestone management of all aspects of the PMR process, including issuing the report and responding to questions and concerns that arise as a result of the report. **The official PMR Report should be issued within 45 calendar days after completion of the on-site review.** For reviews conducted by USACFSC personnel, the NAF Contracting Directorate's Chief of Policy and Operations, after consultation with the Team Leader, is the only individual authorized to extend the release date. If an extension is granted, the Team Leader will provide the reviewed procurement organization with a revised release date.

Report Distribution

Each report will be issued to the Commanding General or General Manager of the procurement organization reviewed with a courtesy copy provided to the Contracting Chief. This includes PMR report for USACFSC's contracting operations (e.g., Operations Division, Major Projects Division) and elements (e.g., Shades of Green, ARMP Contracting Office).

A sample letter for transmitting the report is provided as *Exhibit G*. A copy of all PMR reports, regardless of whether they were prepared by USACFSC or IMA personnel, will be sent to USACFSC, Director of NAF Contracting Directorate. The Director will provide copies to officials who need to know the results of the review, e.g., internal review, legal, finance and accounting.

CHAPTER 3. CLOSING OUT THE REPORT

Introduction

The PMR Team Leader is responsible for ensuring that each PMR report is closed timely. The goal is to approve each corrective action plan for closing findings six weeks (i.e., 60 calendar days) after each report is issued. However, this necessitates general agreement with all findings and recommendations for improvement by the reviewed procurement organization's managers. Frequently this will not occur and adjustments of the acceptance date on the milestones will have to be made. Each PMR report will be closed immediately after all findings have been corrected.

Follow-Up Responsibilities

Each PMR report will be issued with suspense for the reviewed procurement organization to respond to each finding and recommendation. See *Exhibit G*, Sample Letter for Transmitting PMR Report. For those reviews conducted by USACFSC personnel, before the report is closed, the PMR Team Leader will coordinate with USACFSC's Chief, Policy and Operations Division, and Director, NAF Contracting Directorate, to facilitate follow-up action. For those reviews conducted by other than USACFSC personnel, the reviewing organization shall establish procedures to facilitate follow-up action.

Responses to Findings and Recommendations

Within 60 calendar days from receipt of the PMR Report, the reviewed procurement organization is required to respond to each PMR finding by concurring or nonconcurring with the finding and recommendation. They are also required to discuss specific action to be taken and the proposed completion date for each finding to be corrected. Any non-concurrence must be fully justified.

Format for Responses

Responses will be prepared in the format shown at the end of *Exhibit F*, Sample PMR Report (includes Response Format). The PMR Team Leader must ensure that every finding and recommendation is addressed adequately before the report is closed. Moreover, the Team Leader must accept the rationale for non-concurrence or resolve unacceptable issues.

Management Milestones

The PMR Team Leader will prepare milestones to assist with completing the myriad tasks associated with planning, conducting, reporting, and closing multiple PMRs during each fiscal

year. The milestones will also serve as a source of information to determine the status of each PMR on the annual schedule.

Handling Requests for Extensions

Chief of the procurement organization reviewed may find it necessary to request an extension to the 60 calendar days for responses to the PMR reports. All requests for extensions of suspense should be routed to the Team Leader for action. Reasonable requests for extensions may be granted by the PMR Team Leader and annotated on the milestone chart. Requests that do not appear justified will be staffed with USACFSC's Chief, Policy and Operations Division, and Director, NAF Contracting Directorate, or the IMA Regional Director, depending upon who conducted the review, and a decision rendered.

EXHIBITS

[Exhibit A](#) – PMAP

[Exhibit B](#) – PMR Technical Evaluation Checklist

[Exhibit C](#) – Letter of Notification to Commander

[Exhibit D](#) – PMR Evaluation Matrix

[Exhibit E](#) – Sample Interview Questionnaires

[Exhibit F](#) – Sample PMR Report Format (includes Response Format)

[Exhibit G](#) – Sample Letter for Transmitting PMR Report